

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
ST. LOUIS

In Re:	)	Case No. 14-46182
	)	Chapter 7
Donald Eugene Sallee, II	)	
	)	
	)	<b>TRUSTEE'S MOTION FOR APPROVAL</b>
Debtor.	)	<b>OF EMPLOYMENT OF ATTORNEY</b>

COMES NOW Kristin J. Conwell, Chapter 7 Trustee herein ("Trustee Conwell") pursuant to 11 U.S.C. §§327 and 328 files this Motion for Approval of Employment of Attorney and in support thereof respectfully states as follows:

1. Kristin J. Conwell is the duly appointed, qualified and acting Chapter 7 Trustee herein.
2. The Court has jurisdiction in regard to this matter pursuant to 28 U.S.C. §151, §1334, and Local Rule 9.01(B) of the United States District Court for the Eastern District of Missouri. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2). Venue is proper pursuant to U.S.C. §1409.
3. Debtor filed a Petition for Relief under the provisions of Chapter 7 of Title 11 of the United States Code on January 9, 2014.
4. Trustee Conwell requests authorization from the Court to allow her to employ Kevin M. Doyle and Conwell Law Firm, LLC to assist Trustee Conwell in carrying out the Trustee's duties under Title 11 of the United States Code.
5. Trustee Conwell requires the assistance of Counsel to provide such other advice and assistance on matters which may arise during the administration of this estate.
6. Legal services are also required to assist the Trustee in the negotiation and drafting of legal documents, the prosecution of objections to exemptions, objections to claims, and other matters arising in the administration of this bankruptcy estate.
7. Trustee Conwell has made careful and diligent inquiry into the qualifications and competence of Kevin M. Doyle and Conwell Law Firm, LLC.

8. Trustee Conwell has been advised that Kevin M. Doyle has been admitted to practice in the United States District Court for the Eastern District of Missouri and believes that he is capable of providing proper legal counsel to Trustee Conwell.

9. Trustee Conwell states that subsequent and any new employees will be screened or reviewed to ensure that they are disinterested parties and have no adverse connections with any creditor or interested party herein, the United States Trustee or any employee of the United States Trustee, and represent no interest adverse to the estate or to the Debtor.

10. The rate which Kevin M. Doyle and the Conwell Law Firm, LLC charges is currently \$200 per hour. This rate is subject to annual review.

12. Kevin M. Doyle has no connection with any creditor or interested party herein, the United States Trustee or any employee of the United States Trustee, and represents no interest adverse to the estate or to the Debtor.

13. Trustee Conwell has engaged Kevin M. Doyle of the Conwell Law Firm, LLC as attorney for Trustee Conwell subject to the approval and confirmation of said employment by the United States Bankruptcy Court.

WHEREFORE, Trustee Conwell prays that the United States Bankruptcy Court approve and confirm the employment of Kevin M. Doyle and the Conwell Law Firm, LLC as Counsel for Trustee Conwell, and that the Court's Order relate back to the earlier of the date of this application or the Attorney first performed any service on behalf of Trustee related to this matter.

Respectfully submitted,  
Conwell Law Firm, LLC

By: /s/ Kristin J. Conwell  
Kristin J. Conwell, #58735MO  
Chapter 7 Trustee  
P.O. Box 56550  
St. Louis, Mo. 63156  
(314) 652-1120  
kconwell@conwellfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served either through the Court's ECF system or by regular mail this 20<sup>th</sup> day of November, 2014, on the following:

Donald Eugene Sallee, II  
7 Lindworth Dr  
St. Louis, MO 63124-1453

Robert A. Breidenbach  
Goldstein and Pressman  
10326 Old Olive Street Road  
St. Louis, MO 63141-5922

Office of the United States Trustee  
111 S. 10<sup>th</sup> Street, Suite 6353  
St. Louis, MO 63102

Kevin M. Doyle  
Conwell Law Firm, LLC  
PO Box 56550  
St. Louis, MO 63156

/s/Kevin M. Doyle